# **OPTIONS FOR ESSENTIAL WORKER HOUSING IN NEW SOUTH WALES**

**Organisation:** Anglicare Sydney

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# **Anglicare Sydney Essential Workers Submission**

September 2024

# Submission by Anglicare Sydney to the Select Committee on Essential **Worker Housing**

### Introduction

Anglicare Sydney welcomes the opportunity to provide a submission to the Select Committee on Essential Worker Housing. As a leading aged care, social and affordable housing, and community services provider we understand the critical importance of affordable and accessible housing for essential workers, whose roles support the functioning and wellbeing of our communities. We strongly support efforts by the NSW Government to address the growing housing crisis, particularly for essential workers.

Housing is recognised as an international human right. As one study noted, 'The dignity and security of a stable home provides the platform upon which we can fully participate in the social and economic life of our community'. This was a view also expressed a Productivity Commission report where it highlighted the importance of housing in providing shelter, privacy, safety, security, economic and social participation and assist in mitigating poverty and social exclusion."

Anglicare has long been concerned about the numbers of people presenting to our financial hardship programs who are experiencing accommodation issues, are housing insecure or, in some cases, homeless. Increasingly we are seeing more and more people who are on minimum wages and employed also seeking assistance.

Anglicare Sydney's response to this need has been the establishment of several programs providing safe, affordable and supported housing - one totally funded by Anglicare (the Housing Assistance Program) and the other funded by the NSW Government under the Social and Affordable Housing Fund (SAHF).

- The Housing Assistance Program (HAP) established in 2012 with the purchase and refurbishment of a hotel in Chippendale, with the specific aim to provide low cost, safe and secure tenancy to those either at risk of or experiencing homelessness. This program was expanded over the following decade and involved the building or refurbishment of 5 additional sites varying in size and design across Sydney. Currently there are 102 residents in the program, aged 55 years or over (45 years for those of Aboriginal or Torres Strait Islander background) and receiving the Age Pension, Disability Support Pension or Jobseeker payment. Rent is generally charged at 30% of income plus the Commonwealth Rental Allowance (CRA). Anglicare appointed a full-time support worker in 2018, although a great deal of support had been provided in the preceding five years, through regular check-ins for all residents and providing information, referrals and advocacy as required.
- **The SAHF program Primarily funded by the NSW Government, the first SAHF sites were** completed and began operation in March 2019. The program currently operates 9 community housing locations across Sydney and the Illawarra, accommodating 521 residents, the vast majority of whom are women over the age of 55 (45 years if Aboriginal or Torres Strait Islander), who are either homeless or housing insecure. Sources of income vary but, as with HAP, generally include either the Age Pension, Disability Support Pension or Jobseeker, with rent charged between 25% and 30% of income plus the Commonwealth Rental Assistance (CRA).

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# **Anglicare's Housing Principles**

- 1. We believe that the most significant measure that can promote pathways to opportunity and independence for those who are homeless or at risk is that of **continued access to secure, appropriate and affordable housing.** Access to such housing is an important aspect of individual and family well-being and plays an important role in *enabling* economic and social participation.
- 2. We believe that such access is a fundamental human right because it underpins other rights including education, health and water and sanitation. This is in line with UN approaches which have determined that 'the right to adequate housing should not be interpreted narrowly, such as being limited to having shelter or viewed exclusively as a commodity, but rather it is to be understood in a far broader sense: the right to live in peace, security and dignity (UN Committee on Economic, Social and Cultural Rights 1991).'iii
- 3. Our experience in social service delivery is that whilst housing is only one factor to consider when assisting clients experiencing disadvantage, it is often the foundational element upon which individuals and families are able to build or re-build their lives when facing difficulty. Households who are in secure and affordable housing are much better placed to tackle other issues they face such as financial insecurity, unemployment, ill-health and social exclusion. The most critical obstacle faced by many of our clients is indeed the procurement of secure, appropriate and affordable housing.
- 4. Appropriate, affordable, and secure housing is essential to the wellbeing of both individuals and community. When people are uncertain about the sustainability of their housing situation, they experience what the literature refers to as housing insecurity. A lack of stable, secure and affordable housing has significant impacts on individual and family wellbeing. It can exacerbate financial hardship which impacts on the acquisition of basic necessities including food, adequate clothing and heating. It can lead to transience and dislocation, compromising people's sense of place and belonging in communities. The stress and anxiety which housing insecurity generates can lead to relationship breakdown. Often people who live with housing insecurity are transient and may be forced to move to locations which are cheap but have poor transport infrastructure, creating barriers to employment. The lack of stable housing impacts on parents' capacity to attend to their children's developmental needs. This compromises children's educational opportunities and subsequent employment options and life opportunities. For these reasons, we will canvass the issues faced by many of our clients who are vulnerable and socially disadvantaged. For many, the issue of affordable housing cannot be disconnected from other factors of social disadvantage.
- 5. The **increasing scarcity of affordable housing** for low to medium income households therefore has the potential to seriously impact individual, family and community well-being and there is evidence that scarcity is a problem. We believe that the current state of the affordable housing market (public and private) must be viewed together and not in isolation, and the need amongst our clientele demands immediate, coordinated action from all levels of government.

6. Households in the lowest 40% of income distribution should have access to appropriate, secure and affordable housing in either the social or private sector without entering housing stress over the longer term.

# Anglicare Research on Essential Workers

Anglicare Sydney has long been concerned with rental affordability as indicated by more than a decade of publishing the Annual Rental Affordability Snapshot. This report captures the number of rental listings on a selected weekend of March 17 and then assessed affordability for a range of different people groups. To test whether a listing was affordable, we calculated the net income for each category of essential workers using the consolidated modern awards from the Fair Work Commission. Our calculations assumed full-time employment receiving adult wages. Award wages were taken at 1 April 2023, to remain consistent with the weekend on which the properties were advertised in March 2023

For people on low to moderate incomes, rent must not exceed 30 percent of a household budget for it to not cause financial stress. This is an internationally accepted benchmark based on many years of study into the impact of the cost of living. For the purposes of the Snapshot, we focussed on properties that were suitable for a single person. A room in a share house or bedsit is considered suitable. Advertisements for housing in retirement villages and student accommodation were excluded, as were advertisements for holiday accommodation.

The findings are provided in Table 1. What is very evident that for most essential workers rental affordability was between 1%-4% with the lowest number of properties affordable for meat packers, hospitality workers and early childhood educators. These results show that essential workers are finding it tough to afford housing within their own communities. For example, an aged care worker could afford only two percent of available properties. Even the highest paid of the essential workers tested, teachers, could afford only four percent of available rental properties. These results highlight how deep is the crisis in Australia's rental market.

The essential workers identified in Table 1 are vital to the functioning, liveability and wellbeing of our community. The surging cost of housing is contributing to workforce shortages in these essential industries. If no action is taken, both the workforce crisis and the housing crisis will continue to grow.

Table 1 Rental Affordability in NSW by Essential Worker

|    | Occupation                           | # Affordable | % Affordable |
|----|--------------------------------------|--------------|--------------|
| 1  | Aged care worker                     | 255          | 2%           |
| 2  | Ambulance officer                    | 445          | 3%           |
| 3  | Early childhood educator             | 234          | 1%           |
| 4  | Cleaner                              | 259          | 2%           |
| 5  | Construction worker                  | 282          | 2%           |
| 6  | Delivery driver                      | 259          | 2%           |
| 7  | Dispatcher                           | 255          | 2%           |
| 8  | Firefighter                          | 566          | 4%           |
| 9  | Freight driver                       | 255          | 2%           |
| 10 | Hospitality worker                   | 233          | 1%           |
| 11 | Meat packer                          | 233          | 1%           |
| 12 | Nurse                                | 313          | 2%           |
| 13 | Postal worker                        | 259          | 2%           |
| 14 | Retail worker                        | 259          | 2%           |
| 15 | School teacher                       | 581          | 4%           |
| 16 | Social and community services worker | 259          | 2%           |
|    | Total No of Properties               | 16,022       |              |

# **Essential Worker housing implications for service providers**

For Anglicare this lack of rental affordability has implications for workforce strategy particularly in the aged and community care sector. A 2023 internal mapping exercise of the residential post codes of Anglicare staff revealed that the greatest proportion of our aged and community care workers live in the Western and South Western regions of Sydney. Staff find it difficult to travel to the other side of the city where aged care facilities are located, such as the Eastern Suburbs and the Northern Beaches in Sydney. Effectively we are experiencing thin markets in terms of workforce supply in these regions because staff cannot afford to live there and often find travel expensive and time consuming.

Essential workers, including aged care workers, police officer, paramedics, amongst others, play a critical role in our communities. The provision of affordable rental homes for essential workers is a strategic investment in the well-being and resilience of our communities. It supports those who provide critical services and enhances the overall quality of life for the broader community. As one research report highlighted:

' it delivers more efficient labour markets by ensuring adequate accommodation for essential workers and skilled workers for key industries'.iv

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Affordable rental housing for essential workers can also stimulate the local economy. When workers can afford to live in or near the communities they serve, they are more likely to spend money locally, contributing to the growth of small businesses and generating tax revenue.

There thus needs to be a focus in Government policy in supporting developers and community housing providers to develop more affordable housing for essential workers.

# **Response to Terms of Reference**

# a) Definition and Criteria for Essential Worker Housing

Anglicare Sydney supports the development of a clear, inclusive definition of essential worker housing that recognises the broad range of sectors and workers vital to the state's functioning. Essential workers should be defined to include, but not be limited to, those in healthcare, aged care, disability support, education, childcare, law enforcement, emergency services, and community services.

### Priorities:

- Workers in sectors with acute labour shortages, such as aged care and healthcare, where the inability to live close to work exacerbates retention and recruitment challenges.
- Geographical areas where housing affordability is most constrained.
- The need for proximity to high-demand locations (hospitals, schools, aged care facilities) where essential workers are needed in larger numbers.

# b) Options to Increase Housing Supply for Essential Workers

In order to improve affordability and accessibility in the private rental market for essential workers it is imperative that there is an increase in housing supply – particularly that which relates to both social and affordable housing. Undoubtedly the pressure on affordable private rental would be eased with an increase in the supply of both social and affordable housing as it will reduce the demand pressures in the rental market which appear to be driving the current rental affordability crisis. Additionally ensuring workers can live close to their place of employment will improve productivity as highlighted in research by AHURI:

Higher income earners in skilled occupations will attract a sufficient wage premium to compensate for higher housing costs (and in turn contribute to housing demand). However, lower and moderate income workers who also play critical roles in urban economies are more likely to experience housing stress (exceeding 30% of their income on housing costs) in these markets. Thus, increasing the supply of affordable housing, and particularly rental housing that is affordable to low and moderate income earners, is an important strategy to support economic growth in areas of high employment opportunity.<sup>1</sup>

Anglicare also recognises the critical link between increasing overall social and affordable housing supply and rental relief for essential workers.

<sup>&</sup>lt;sup>1</sup> AHURI (2022), *Urban productivity and affordable rental housing supply in Australian cities and regions*, Final Report Number 353, sighted at <u>Urban productivity and affordable rental housing supply in Australian cities and regions (ahuri.edu.au)</u>, P12

### Positive Housing supply initiatives for essential workers

We recognise and applaud the NSW Government's increase of the supply of social and affordable housing and that this has been an ongoing commitment. In the 2021 NSW budget the Government committed to 9,386 new social housing properties by 2026 (excluding replacement stock). In June 2024 the NSW Government specifically addressed the increasing affordable housing needs of essential workers in its release of \$450m in the June 2024 budget to build new apartments for essential workers including nurses, paramedics, teachers, allied health care workers, police officers and fire fighters to rent at a subsidised rate in areas closer to the city, their jobs and services. Across four sites it is estimated that more than 400 new build to rent dwellings will be created in the next three years in order to retain essential workers, mostly in metropolitan Sydney.

Additionally there are a number of other supply options which have emerged in the Community Housing and private sector which could be encouraged.

# **Ongoing Supply issues**

Despite these initiatives however the housing issue is far from resolved. Community Housing NSW estimates that there are 56,000 households on the social housing waitlist some of whom will wait 10 or more years to be housed.vi AHURI estimates there will be a shortfall of approximately 212,700 social houses in NSW by 2036 when considering need arising from homelessness and those on low-income living in rental stressvii. The promised 9,386 new social houses in NSW by 2026 will only account for 5% of projected need by 2026 (approximately 174,000 new social houses). In addition, the NSW government has sold off large quantities of social housing, including 4,205 properties since 2011viii. ACOSS has estimated that the proportion of social housing to total households in NSW will diminish over the next 3 years.ix Social housing waiting lists in NSW have become increasingly reserved for those with the most complex needs.

Investment in the social and affordable housing sector is economically beneficial. A report by Equity Economics found that building an additional 5,000 new homes per year in NSW would create 16,200 new jobs and generate \$5.2 billion for the economy each year.\* Furthermore, by leveraging partnerships with community housing providers the NSW Government could save up to \$631 million plus additional maintenance costs. Unlike public housing, Community Housing providers can leverage additional Commonwealth Rent Assistance for their tenants and do not pay GST on costs.

Apart from recent funding support the NSW Government should consider the release of Crown Land to non-profit organisations (particularly land close to transport and employment areas) for social and affordable housing, particularly to address severe shortages in regional areas. However, this should be done with consideration for the environmental impact of development and while ensuring that adequate infrastructure is available to support new developments.

• **Recommendation 1**: The NSW Government increase its commitment of social housing to 5,000 new homes every year for 10 years including expanding community housing partnerships to achieve this.

### Incentivise investment in social and affordable housing by the private sector

Anglicare Sydney believes there are a range of policy avenues which should be considered in order to incentivise investment in social and affordable housing by the private sector and to adequately fund social housing, including:

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**Financing Community Housing Providers** - Using the NHFIC (National Housing Finance and Investment Corporation) to ramp up finance for Community Housing Providers to be able to finance social and affordable housing at low or no interest, which essentially reduces financing risk. This is already happening but could be scaled up with further guarantees of return from governments. Financing sourced from superannuation funds, if backed by government guarantees of returns or subsidies, could see rapid expansion of building programs particularly if combined with access to government land.

By its nature, social and affordable housing has a funding gap as building, procuring and maintaining affordable housing won't be offset by the lower rents that tenants pay. In comparison to other countries such as the UK, US and Switzerland, Australia lacks a strategy for funding affordable housing while other countries utilise significant tax concessions, upfront capital gains payments, government guarantees and/or sufficient tenant income supports (eg: Commonwealth Rent Assistance) to help bridge the funding gap.xi The National Rental Affordability Scheme provided generous incentives but with no compulsion to continue to hold these as affordable housing past ten years, we are now seeing many of these disappear from the market. A new program focused on providing these same incentives through CHPs and Disability organisations may see much of this investment continue as affordable for much longer into the future.

**Shared-equity schemes** – can be a way of helping lower income households buy a home. Low-to medium-income households that are attempting to buy their first home in unaffordable housing markets have been greatly assisted by shared-equity schemes in Victoria. The Barnett Model in Victoria provides housing opportunities for people with low incomes. The prospective home-owner secures a loan on 63% of the value of an apartment, while the Barnett Foundation advances the remaining 37%. This advance does not attract fees or interest and is payable on the sale of the unit.

### Recommendation 2

Increase finance to Community Housing Providers to be able to finance social and affordable housing at low or no interest.

### **Planning Tools and Reforms**

Both the NSW Government and local governments should support **inclusionary zoning measures** in metropolitan and rural areas. For example, legislating for a minimum 10-15% of new housing to be social or affordable, with the option to either include units of housing or, alternatively, to pay the equivalent towards a housing fund. Inclusionary zoning within the Green Square precinct saw City West build significant tranches of affordable housing in the inner Sydney ring.<sup>xii</sup>

In addition, both the **State government and local governments** should consider planning measures which accelerate and streamline the construction of social and affordable housing. Local Councils are often not adequately equipped nor supported to deliver on these housing outcomes, especially amongst the more vulnerable. There is a lack of consistency in the way Local Councils approach social and affordable housing. For example, in some LGAs there are still large developments going ahead or proposed without any affordable housing component at all. We acknowledge that the need for affordable housing varies across LGAs and would like to see Local Councils equipped and supported by the Government to deliver affordable housing in a way that meets the needs of their communities. State planning and housing agencies are involved in housing processes, and there are also a raft of local government processes that deal with housing considerations in various ways, including in relation to planning - these processes need to be streamlined and standardised across the various agencies involved.

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There needs to be a process of accelerated or automatic approvals and/or reversing the onus (affordable developments are presumed to be approved unless the relevant Minister rules otherwise) where a development contains a minimum proportion of affordable housing (e.g. 30-50%) and meets certain criteria (such as complying with a pattern book for design and build quality to reduce planning and development risk.

As old social housing stock is sold off, it must be replenished with similar new dwellings (with the same number or more bedrooms to meet the diversity of needs in the community) and in the same or neighbouring Local Government Areas to ensure that there is housing stock available as the needs of people change with a mix of social housing across the city forming integrated communities. Further, all proceeds of any public housing sale need to be directed into a pool of funds for public housing.

We would like to see a specific **commitment to increase the social and affordable housing stock in new developments**. The scarcity of affordable housing for-low-income households has the potential to seriously impact individual, family and community well-being. Inclusionary zoning could meet this need, especially where significant infrastructure investment is likely to lead to increased land values, thereby pricing a lot of lower-income households out of the market. In the Greater Sydney region, the disparity between new suburbs with no inclusionary zoning policies in place and other suburbs where there is a concentration of social and affordable housing is concerning, as it further entrenches already existing socioeconomic issues.

Further reforms which prioritise essential worker housing in planning frameworks could include:

- Expanding the State Environmental Planning Policies (SEPP) to prioritise affordable essential worker housing developments.
- Parcelling TOD SEPP zones to allow not-for-profits to bid for land (who currently do not
  have the capacity to compete with major private developers) for the purposes of
  building essential worker and social housing.

**Recommendation 6**: Consider a raft of zoning measures at both NSW and Federal levels including:

- Inclusionary zoning measures in metropolitan and rural areas.
- State government and local governments consider planning measures which accelerate and streamline the construction of social and affordable housing.
- greater use of government-owned land for housing
- greater investment by the Government in subsidy schemes similar to the National Rental Affordability Scheme (NRAS), which could leverage church land in the provision of more affordable housing.
- specific commitment to increase the social and affordable housing stock in new developments.
- An accelerated or automatic approvals and/or reversing the onus where a development contains a minimum proportion of affordable housing.

### **Opportunities Within Developments on Government-Owned Land**

We strongly call for greater use of government-owned land for housing. We recommend this idea be developed and extended to include a comprehensive and collaborative review of the unoccupied and vacant government properties (e.g. those held by utility companies, adjacent to rail corridors or over bus depots etc) that focuses on ways in which these properties could be redeveloped by the community housing sector, rather than being sold off opportunistically based on land value or left unoccupied. This could be done by way of long-term leasehold to not-forprofit providers to ensure that public land is not permanently alienated or exploited for private profits. Other suggestions include:

- Designating government-owned land for mixed-use developments that prioritise essential worker housing.
- Exploring options for not-for-profits to bid for Government land or build on as part of a leasing arrangement with the Government.
- Incorporating essential worker housing requirements into social and affordable housing programs on government land.

## Implement measures to protect private renters

Housing supply is not the only issue, protecting renters in the longer term is also critical. Anglicare Sydney makes the following recommendations:

- Replace 'no grounds' evictions with specific 'reasonable grounds' for eviction: This would require reasons to be provided by the landlord in the event of an eviction and disincentivise retaliatory evictions.
- Mandate eviction compensation or rent waivers for fixed- low-income tenants if a tenant is evicted with no fault: This would protect low-income renters from the significant cost of eviction. Tenants NSW have proposed a relocation payment of \$3970 based on estimated average moving or a 4-week rent waiver.xiii
- Encourage the adoption of longer-term leases: This would improve security of tenure for older tenants and help alleviate fear of eviction. The NSW Standing Committee on Social Issues has recommended that longer-term leases of at least three years become standard in residential tenancy agreements<sup>xiv</sup>. A useful parallel are commercial leases which are typically multi-year, contain a fixed formula for rent increases (e.g. plus CPI on the anniversary) and provide for less intrusion by the landlord. Adopting such features into residential leases would increase security for the tenant and are likely to mutually benefit many landlords, particularly institutional landlords.
- Adopt accessibility measures under the National Construction Code: NSW continues to opt out of the minimum accessibility standards that form part of the 2022 National Construction Code. These standards require new homes and units to have mandatory accessibility features such as at least one-step free entrance, a toilet on entry level and reinforced walls in bathrooms to allow for installation of support rails.xv
- Fund a specialist homelessness service for older people: Homelessness services in NSW are ill-equipped to deal with older people, particularly older women, with services often tailored to young people and families. There is a need for improved early intervention and prevention services to reach older Australians before they become homeless, avoiding the mental and physical consequences of homelessness. Many older people come to homelessness in later life and often speak of stigma and difficulty navigating the homelessness system. Older people at risk of or experiencing homelessness often seek support from services that are ill-equipped to assist them.xvi

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**Recommendation 7:** Implement a range of measures to protect private renters including:

- 1. Replace 'no grounds' evictions with specific 'reasonable grounds' for eviction.
- 2. Mandate eviction compensation or rent waivers for fixed- low-income tenants if a tenant is evicted with no fault.
- 3. Encourage the adoption of longer-term leases.
- 4. Adopt accessibility measures under the National Construction Code.

# **Conclusion**

Anglicare Sydney appreciates the Select Committee's focus on essential worker housing and looks forward to further contributing to policy development in this area. We strongly advocate for solutions that address both the immediate and long-term housing needs of essential workers, ensuring they can live affordably in the communities they serve.

We would be pleased to provide additional information or clarification to support the Committee's inquiry.

Yours sincerely



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iii UCL Institute for Innovation and Public Purpose (2023) The right to housing: A mission oriented and human rights based approach, sighted at The right to housing: A mission-oriented and human rights-based approach | UCL Institute for Innovation and Public Purpose - UCL - University College London

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<sup>&</sup>lt;sup>1</sup> Carnemolla C and Vivienne Skinner (2021) 'Outcomes Associated with Providing Secure, Stable and Permanent Housing for People Who have been Homeless: An international Scoping Review', *Journal of Planning Literature*, vol 36(4), PP508-525.

ii Productivity Commission (2022) In need of repair: the National Housing and Homelessness Agreement, August, sighted at <u>Study Report - Housing and Homelessness Agreement Review - Productivity Commission (pc.gov.au)</u>

- iv SGS Economics and Planning (2023) *National Housing Assistance Policy: Trends and Prospects*, sighted at <u>SGS-Economics-and-Planning Commonwealth-housing-policy occasional-paper.pdf (sgsep.com.au)</u>, P7.
- <sup>v</sup> Barnes E, Writer T and Chris Hartley (2021) 'Social housing in NSW. Report 1: Contemporary analysis', Centre for Social Impact (UNSW), sighted at https://www.csi.edu.au/media/uploads/social housing in nsw contemporary analysis.pdf, P3.
- vi Community Housing NSW (2023) *By Community, For Community State Budget 2023 Priorities*, sighted at <u>State Budget 2023 Priorities Four-Point Plan Document (communityhousing.org.au)</u>
- vii Lawson J, Pawson H, Troy L, van den Nouwelant R and Carrie Hamilton (2018). Op Cit. P4.
- viii Legislative Council (2022), Homelessness Amongst Older People Aged Over 55 in New South Wales, sighted at
- https://www.parliament.nsw.gov.au/lcdocs/inquiries/2865/Report%20No.%2061%20-%20Homelessness %20amongst%20older%20people%20aged%20over%2055%20in%20New%20South%20Wales%20-%20 October%202022.pdf, P63
- ix ACOSS (n.d) *Projected Change in Social Housing Proportionate Share of all Housing, 2021-22, 2023-24,* sighted at <a href="https://povertyandinequality.acoss.org.au/data/projected-change-in-social-housing-proportionate-share-of-all-housing-2021-22-2023-24/">https://povertyandinequality.acoss.org.au/data/projected-change-in-social-housing-proportionate-share-of-all-housing-2021-22-2023-24/</a>.
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- <sup>xi</sup> Pawson H, Milligan V and Yates, J (2019) 'Housing policy in Australia', Springer Verlag: Singapore, PP288-289.
- xii Spiller M (2021) *The Affordable Housing Beacon We Sailed Past*, sighted at https://www.sgsep.com.au/publications/insights/the-affordable-housing-beacon-we-sailed-past.
- xiii Ibid., P61.
- xiv Legislative Council (2022), Op Cit, P73.
- <sup>xv</sup> Guardian Australia (2022), NSW's Rejection of Basic Accessible Home Standards 'Salt in the Wound' for Disabled People, sighted at <a href="https://www.theguardian.com/australia-news/2022/aug/29/nsws-rejection-of-basic-accessible-home-standards-salt-in-the-wound-for-disabled-people">https://www.theguardian.com/australia-news/2022/aug/29/nsws-rejection-of-basic-accessible-home-standards-salt-in-the-wound-for-disabled-people</a>.
- <sup>xvi</sup> Ageing on the Edge (2021), *Homelessness among older people aged over 55 in NSW*, sighted at homelessness among older people aged over 55 in nsw ageing on the edge coalition.pdf PP10-12.